

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

TRANSCRIPT
OF
SWORN STATEMENT
OF
JOSHUA FIELDS,

taken on behalf of the Insurance Company before a
Certified Shorthand Reporter of Oklahoma at 1324 East
Grand Avenue, Ponca City, Kay County, Oklahoma, on
Thursday, March 18, 2021, starting at 10:05 a.m.

REPORTED BY:

Sonya Kay Meneely, CSR
SCRIBE REPORTING SERVICES
WWW.OKREPORTERS.COM

EXHIBIT 1

A P P E A R A N C E S:

THE WITNESS APPEARED BY HIS COUNSEL:

Mr. Scott R. Jackson
Martin, Jean & Jackson
1324 East Grand Avenue
Ponca City, Oklahoma 74601

THE INSURANCE COMPANY APPEARED BY ITS COUNSEL:

Mr. Michael S. Linscott
Doerner, Saunders, Daniel & Anderson
William sCenter Tower II
Two West Second Street, Suite 700
Tulsa, Oklahoma 74103

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

WITNESS	PAGE
JOSHUA FIELDS	
Examination by Mr. Linscott	4
EXHIBITS MARKED	
No. 1 - nine-page Limited	
Multi-Peril Survey	8
CERTIFICATE OF CERTIFIED SHORTHAND REPORTER	49

1 JOSHUA FIELDS,
2 of lawful age, having been first duly sworn on his oath
3 to state the truth, and nothing but the truth, states
4 as follows:

5 EXAMINATION

6 BY MR. LINSKOTT:

7 Q. Okay. Mr. Fields, if you would state your
8 full name for the record.

9 A. Joshua Charles Fields.

10 Q. Okay. And we've already established you are
11 not the Josh Fields that beat OU a few years ago --

12 A. No, sir.

13 Q. -- as quarterback.

14 All right. My name is Mike Linscott and I'm
15 here representing the insurance company that had the
16 insurance on the property that is at issue that burned.
17 Okay? And that's what we're here to talk about today.
18 Do you understand that?

19 A. Yes, sir.

20 Q. Okay. And this is an examination under oath
21 so you've been sworn in to tell the truth just as if
22 you were in front of a judge and a jury. Right?

23 A. Yes, sir.

24 Q. Okay. And this -- we think we established
25 this off the record, but there is not a lawsuit filed

1 at this time by you against the insurance company or
2 others related to this fire. Is that correct?

3 A. I believe that's correct. Yes.

4 Q. Okay. All right. I'm going to ask you some
5 questions and try to get very focused to just things
6 about the policy and the event, you know, with the
7 building in question and so forth.

8 If I ask you something that you don't
9 understand, or more likely I don't make very clear, ask
10 me to clarify it. Is that okay?

11 A. Okay.

12 Q. And if you do that -- otherwise, we'll assume
13 you understood the question when you answer it. Okay?

14 A. (Affirmative head nod.)

15 Q. And you'll have to say yes or no.

16 A. Yes. I'm sorry. I'm sorry.

17 Q. Hard to do.

18 A. I get it. I get it.

19 Q. And sometimes this may wind up being like
20 conversation, but it's tough on the court reporter and
21 we need to have a good record for this.

22 A. Can't hear my head rattle. I get it.

23 Q. Well, yeah. We just have to say something and
24 it can't be uh-huh, huh-uh. Yes or no.

25 A. Yes.

1 Q. And then I need to let you finish, okay,
2 before I start asking a question. And if you'll show
3 the same courtesy to me, again, that will help the
4 court reporter. Is that okay?

5 A. Yes.

6 Q. All right. The Examination Under Oath, I'll
7 just tell you from our perspective is pursuant to the
8 policy. It's your cooperation, you know, with
9 assisting us in trying to determine coverage that you
10 have. Do you understand that?

11 A. Yes, sir.

12 Q. All right. And I do appreciate you being here
13 today.

14 Okay. The policy in question, do you know how
15 long you've had that policy on that property?

16 A. That policy? I mean, I don't really know how
17 insurance policies work, but I had insured it when I
18 bought it through Zac Swords, and then he sold his
19 insurance policies to somebody in Tonkawa, or Randall
20 or something. And I think that -- so I'd had it for as
21 long as I'd owned the building.

22 Q. And how long -- when did you buy the building?
23 Do you recall?

24 THE WITNESS: Scott, we talked about that
25 the other day. What did I tell you? 2010 or '11

1 maybe?

2 BY MR. LINSKOTT:

3 Q. And look. This is just to the best of your
4 knowledge. I know that there may be some records that
5 we could look at and I know we have something on it.
6 I'm just trying to see what you know now.

7 A. Yeah.

8 Q. And then if you don't know --

9 A. I don't know.

10 Q. -- then don't hesitate to say that.

11 A. I don't know for sure.

12 Q. Okay. All right. There was a -- do you
13 recall having an inspector with someone called Reliable
14 Inspections contact you back in 2015 about the
15 building, about inspecting the building and asking you
16 some questions about that?

17 A. I don't recall that. I know that I have had
18 inspectors from time to time to rental properties, yes.

19 Q. Okay. And so -- okay. Well, I'm going to
20 show you a report here in just a minute from that. But
21 I was just wondering if you happen to remember that,
22 where they were -- where the inspector was looking at
23 and asking questions of whether or not you had any type
24 of fire protection device or devices in the building.
25 Do you recall that better now?

1 A. No.

2 MR. LINSKOTT: Okay. All right. Let's
3 mark one thing here as an exhibit here. Let me find it
4 first. Okay. I've just got two of these, so I'm going
5 to let you look at it and then let me mark this one.

6 (Exhibit Number 1 was marked for
7 identification.)

8 MR. JACKSON: Okay. Take a look at that
9 real quick. Can we make another copy? Do you mind?

10 MR. LINSKOTT: I don't mind a bit.

11 (An off-the-record discussion was here had,
12 followed by a brief recess.)

13 BY MR. LINSKOTT:

14 Q. Okay. Well, let's go back on the record.

15 All right. I handed you what is marked as
16 Exhibit 1 to your Examination Under Oath and I'll just
17 tell you the title of it. It was generated by a
18 company called Reliable Reports of Texas. I think I
19 said Reliable Inspections. My apologies. It's called
20 a Limited Multi-Peril Survey. And you've had a chance
21 to look it over?

22 A. Yes.

23 Q. Okay. I'll ask you a few questions. But
24 first off, the front page of it, it has a For
25 Completion by the Insured. Do you see that?

1 A. It says what now?

2 Q. In the middle of the page it says --

3 A. Oh, yeah.

4 Q. Do you see that?

5 A. Yeah.

6 Q. And it has a part where printed name is Josh
7 Fields?

8 A. Yes.

9 Q. Do you recall printing your name in there?

10 A. I don't think I printed that, but ...

11 Q. Okay. Is the signature on here your
12 signature?

13 A. It looks like it could be, yes.

14 Q. Well, I need to know if it is or not.

15 A. Yes, sir. Yes.

16 Q. Okay. If it's not, someone else did it and I
17 need to know who that was. But anyway, if it's your
18 signature just ...

19 A. It resembles my signature.

20 Q. Okay. Do you --

21 A. But I don't remember it and my signature may
22 have changed a little over the last six years.

23 Q. Okay. Do you recall reviewing this and then
24 signing it, recognizing what it says in here, that it
25 says: Certified that all required recommendations

1 found during the recently-conducted inspection have
2 been fully complied with as of July 23, 2015.

3 Do you recall reading this and signing that?

4 A. Do I recall, no. But do I remember an
5 insurance, yes.

6 Q. Okay. Do you recall -- does this help or
7 maybe you had -- excuse me. Not maybe -- that you had
8 a phone call with a Jack McNeal of RRI here, Reliable
9 Reports, about your building back in July of 2015?

10 A. No.

11 Q. Okay. If he was to indicate that he had such
12 a phone call with you, do you think he'd be mistaken in
13 some way?

14 A. No. I don't think that he'd be mistaken. I
15 just don't recall a phone conversation.

16 Q. Okay. All right. It says the property
17 location is 410 West Cleveland. Is that the property
18 that you've got the claim on?

19 A. That's correct.

20 Q. Okay. And is it fair to say that's an
21 apartment building?

22 A. Yes, sir.

23 Q. Okay. If you'll turn in to this about three
24 pages or so, four I guess it is, there is some
25 pictures. Do you see those?

1 A. Yes.

2 Q. Okay. I want to make sure we're talking about
3 the same building.

4 A. That's it.

5 Q. Is that it? Okay. And then it looks like a
6 front and a back view. Is that correct?

7 Well, no. Excuse me. Two front views, I
8 guess.

9 A. That's two front views on that page.

10 Q. Okay. And then the next page, it says inside
11 stairway, and then the next one is rear?

12 A. Yes.

13 Q. Are those correctly identified?

14 A. Yes.

15 Q. Okay. And the stairway, that's an exterior --
16 is that an exterior stairway down there where it's open
17 on either end of the building, the stairway is?

18 A. The hallway is open on either end. The
19 stairwell --

20 Q. Yeah. Yeah. I'm sorry. Okay. You're
21 saying on either end of that hallway that the stairway
22 is open?

23 A. Yes.

24 Q. Okay. And do you remember whether Mr. McNeal
25 actually went inside any of the apartments? Do you

1 know?

2 A. I would venture to say he didn't, but I don't
3 know that.

4 Q. Okay. All right. My understanding is that he
5 did not and that the information about what I'm going
6 to ask you about what's inside came from you on a phone
7 call.

8 A. Okay.

9 Q. But I'll -- we'll get to that here in just a
10 minute.

11 Okay. If you look at the next page, it has a
12 couple what looks like garages or Buildings 2 and 3.
13 Do you see that?

14 A. Yes.

15 Q. What are those?

16 A. They were I think originally designed to be
17 storage units for the tenants.

18 Q. Okay.

19 A. We pretty much just used them for storage,
20 supplies for maintenance.

21 Q. Okay. And then the next page shows overgrown
22 bushes and then concrete blocks that are -- it says
23 cracked, but I assume that meant cracked.

24 A. Yes.

25 Q. Okay. All right. Do these -- and then the

1 back page just shows the rear again of the building,
2 two pictures; is that right?

3 A. Yes.

4 Q. And then the next last page --

5 A. Uhm --

6 Q. Oh, sorry. Go ahead.

7 A. Yeah. That is the rear.

8 Q. Okay. And then the last page is peeling paint
9 on the fascia board. Do you see that?

10 A. Yep.

11 Q. Okay. All right. Now, if you go back to the
12 front page underneath at the top of it, it says
13 recommendations. Do you see that?

14 A. Yes.

15 Q. Okay. So the first one here, he notes some
16 deficiencies. And it's like it says -- oh, he notes
17 the cracks in the exterior wall of the garage and
18 storage buildings, trees touching the storage
19 buildings, a window on the main building is being
20 boarded over. And then it suggests that a licensed
21 contractor should be retained to evaluate and repair
22 these deficiencies, the cracks in the concrete blocks
23 and mortar in both the garage and the buildings, and
24 the cracks -- excuse me -- on the west side of the
25 garage storage building.

1 Did I read that, summarize that roughly?

2 A. I think so.

3 Q. Okay. Did you -- were you aware of these
4 suggestions that I just referred to in that paragraph?

5 A. I don't recall them, but I mean, I'm aware of
6 the cracks in the walls, yes.

7 Q. Okay.

8 A. And I do remember going and trimming trees at
9 some point because of insurance reasons.

10 Q. Okay. And do you recall taking -- doing these
11 -- do you recall whether or not these suggestions,
12 whether you completed or followed the suggestions and
13 did them?

14 A. I never did anything with the cinder block
15 walls, no.

16 Q. Okay. But everything else?

17 A. I would assume. I've bought lots of windows
18 in my days, so I would assume that I replaced the
19 window.

20 Q. Okay.

21 A. I'm not -- I'm not even sure that the garages
22 were part of the insurance policy on that, so I'm not
23 sure it was even any of their concern.

24 Q. Okay. The next one has to do with smoke
25 detectors. Let me just ask this generally: Were there

1 smoke detectors inside the building at the time of this
2 inspection in '15?

3 A. Yes.

4 Q. Okay. And were they -- do you recall whether
5 you specifically --

6 A. Well, let me back up. I assume there was
7 smoke detectors inside the building. I can't -- I
8 mean, I didn't go in every apartment that day when he
9 did the inspection and verify.

10 Q. Okay.

11 A. But we were pretty adamant about keeping smoke
12 detectors within the building.

13 Q. Okay. So I guess as I sit here, their
14 recommendation -- let me ask it this way. Scratch
15 that.

16 The second recommendation there marked, you
17 know, 5-2-2015, it says it recommends a maintenance
18 program should be implemented for the smoke detectors
19 with batteries being tested on a monthly basis and
20 batteries being completely replaced every six months.
21 Written documentation should be retained regarding
22 testing and replacement.

23 Did I read that correctly?

24 A. I'm not reading it, but I would -- yes. Yes.

25 Q. Do you -- well, let me ask this: Did you do

1 something? Did you do that? Did you implement a
2 program for the smoke detectors, replacing the
3 batteries and replacing any units and then documenting
4 it?

5 A. Every time somebody moved out before somebody
6 moved in, we checked the smoke detectors, replaced the
7 smoke detector if it didn't work.

8 Q. Okay.

9 A. So, yes. Yes.

10 Q. Did you document that in some way?

11 A. No, sir.

12 Q. Okay. All right. Would you have -- I mean,
13 each time you did that would you have receipts or would
14 you use it -- you know, keep it for tax reasons or
15 anything like that?

16 A. No, sir.

17 Q. Okay. Let me go to the last one here. On the
18 -- it says all exterior having three or more steps
19 should be provided with handrails on both sides to
20 reduce the potential for falls. Handrails, and it
21 gives a description of the height and length.

22 Did you do that?

23 A. I don't know that I have any exterior stairs
24 with three or more steps, so I would say no.

25 Q. Okay. Would you call the stairway we were

1 looking at in the picture an exterior stair or not?

2 A. No, sir. That's an interior stair.

3 Q. Okay.

4 A. And we did install handrails there, actually,
5 since you mentioned it.

6 Q. Yeah. It looks like there's handrails on it.

7 A. It was in the picture. There was handrails
8 there.

9 Q. Okay.

10 A. But that's an interior stairwell. That's not
11 an exterior stairwell.

12 Q. Okay. Inside the building, okay, do you
13 access -- do people access their apartments through
14 doors that are inside off a hallway or are they
15 exterior?

16 A. They're interior doors.

17 Q. Okay. So in the -- is there a common --
18 scratch that.

19 Is there a --

20 A. Corridor?

21 Q. -- interior corridor for the apartments?

22 A. Yes, sir.

23 Q. And that is interior; right?

24 A. Yes, sir.

25 Q. And then you have fire detection, fire/smoke

1 detectors in the hallway that was interior?

2 A. There may have been one upstairs but I can't
3 -- I don't recall. I don't know. We had several
4 problems with people. If you left anything where the
5 general public could get to it, it would walk off.

6 Q. Okay.

7 A. So I don't know if it was there at the time or
8 not, no.

9 Q. Okay. Do you recall replacing fire or smoke
10 detectors in the hallways between the apartments, you
11 know, where the people access their apartments from, do
12 you recall replacing the batteries in those?

13 A. Me personally, no.

14 Q. Or having someone doing it?

15 A. I just got smoke detectors when I was told we
16 needed smoke detectors or batteries.

17 Q. Do you have a property manager?

18 A. I had a guy that lived there that took care of
19 everything, yes.

20 Q. Okay. And what was his name?

21 A. Keith Crawford.

22 Q. Okay. Do you know if Keith Crawford is still
23 around or working with you?

24 A. He's not in Oklahoma anymore. He's moved to
25 Arkansas the last I knew.

1 Q. Okay. How long ago was that that he left?

2 A. I would be guessing, but I would say -- what
3 is this? I would say eight months.

4 Q. Okay. So he was there when the fire occurred?
5 Is that true?

6 A. He was working for me then.

7 Q. Okay. Yeah. Doesn't mean he was actually on
8 site, though; right?

9 A. Yeah. No. Nobody was on site.

10 Q. Okay. And I'm getting to that.

11 Okay. So Keith Crawford would have been --
12 would he have been, at that time of the fire, would he
13 have been working as a property manager for you or
14 doing odd jobs at the site?

15 A. He was in the process of remodeling the
16 building.

17 Q. Okay. Okay. Let's see. The fire occurred
18 on, what, March 25th of 2020? Is that right?

19 A. I believe that's close.

20 Q. Okay. That's what I have here.

21 A. That's what my pictures were dated. I took
22 pictures of it the night of.

23 Q. Okay.

24 A. Or the morning of.

25 Q. Have you provided those pictures to the

1 insurance company?

2 A. I haven't ever talked to the insurance
3 company.

4 Q. Ahh. Okay. Okay. I'll get to that in just a
5 minute.

6 Okay. On the smoke detectors, so if anyone --
7 is this accurate to say: If anyone made sure that the
8 smoke detectors were, one, there either in the
9 apartment or in the hallways, and had fresh batteries,
10 would that have been Mr. Crawford?

11 A. Yes, sir.

12 Q. Okay. And was he directed to take care of
13 that?

14 A. Yes, sir.

15 Q. Okay. Sometimes you hire someone as property
16 man and they just know to do it. I was just wondering
17 if you particularly directed, hey, you need to make
18 sure you --

19 A. He was one you had to give pretty good
20 direction to.

21 Q. Okay. And you remember doing that?

22 A. Oh, yes.

23 Q. Okay. All right. How about fire
24 extinguishers? Do you recall whether there were fire
25 extinguishers in the common area, the hallway?

1 A. Not the common area.

2 Q. Okay.

3 A. We kept fire extinguishers in the sinks -- or
4 under the sinks in the kitchens.

5 Q. Of the apartments?

6 A. Yeah. Like where you would keep one in your
7 house.

8 Q. Right.

9 A. Yeah.

10 Q. Okay. And did you have a regular maintenance
11 program of some sort to make sure that they were still
12 there?

13 A. That was one of the things we always checked
14 when people moved out.

15 Q. Okay. So it's when they moved out, you
16 checked that?

17 A. Yes.

18 Q. Would you make sure there was a fire
19 extinguisher there if it was missing for some reason?

20 A. Yes.

21 Q. Okay. Okay. Were there any other type of
22 fire protection devices that you feel were at the
23 apartment complex at the time of the fire other than
24 fire extinguishers or smoke detectors?

25 A. I don't think so. I don't know what other

1 types of fire devices there are.

2 Q. Okay. Do you believe at the time of the fire
3 that there was smoke detectors and fire extinguishers
4 in the apartments and in the hallways?

5 A. I do not.

6 Q. Okay. Why do you think they were not?

7 A. Because I directed Keith to remove them.

8 Q. Okay. And when did you direct Keith to remove
9 them?

10 A. When we started gutting -- or cleaning out the
11 building to start remodel.

12 Q. Okay. And when was -- when was that? When
13 did you gut the building to start remodel?

14 A. Well, we never gutted it. We started cleaning
15 it out, but that would have been, best estimate, first
16 part of February, 2020.

17 Q. Okay. So okay. The first part of February.
18 Is there a way that you can identify the date where the
19 tenants were not in the building any longer and you --
20 maybe let me start with that; that you did not have any
21 more tenants living in the building. During -- for
22 this remodel, I mean. Sorry.

23 A. I have a tenant that could tell me when he
24 moved out, which I believe would have been January 30th
25 or January 31st when I told them they had to be out.

1 Q. Okay.

2 A. And then there was another tenant there that
3 moved out a day or two after.

4 Q. Okay. Do you know the names of these tenants?

5 A. The one that I talked to, his name is Keith
6 Alston.

7 Q. And that's the one that you think would have
8 left on January --

9 A. He left right at the end of January.

10 Q. Okay. So you're thinking he left by January
11 30th or 31st?

12 A. I would say yes.

13 Q. Okay. And that's Keith Alston. Do you have
14 any contact information for him?

15 A. Yes.

16 Q. Okay. Would you mind providing that to us?

17 A. No, sir.

18 Q. Just through your counsel.

19 A. Yeah. He has it. I've given it to him.

20 Q. Oh, okay.

21 MR. JACKSON: I was going to look. I
22 think Josh's wife actually was able to find him and
23 sent that to me maybe last night or today.

24 MR. LINS COTT: Okay. Okay.

25 MR. JACKSON: I'll look for it and see.

1 BY MR. LINSCOTT:

2 Q. (By Mr. Linscott) What about the other one?
3 You said there was somebody else that may have still
4 been there?

5 A. I don't know her name. She lived above Keith
6 and I don't recall her name.

7 Q. Okay. Do you have any records that might show
8 when she left? We're just -- all I'm looking to do is
9 try and establish when the last person was moved out
10 before the fire.

11 A. No, sir. I don't have any records of that.

12 Q. Okay. Okay. Now, let me ask this: Prior to
13 that -- okay. How many apartments are there in that --
14 in that building?

15 A. Eight.

16 Q. Okay. And when did you make the decision to
17 remodel the apartments?

18 A. I don't know exact date. It was something
19 that was in the process. I mean, I'd been kicking it
20 around for some time and so I just -- it was just like,
21 all right, this is -- I don't know. I guess I don't
22 know the date.

23 Q. Okay. And I guess I'm asking for
24 generalities. And if you don't know, that's fine.
25 I'm just thinking was it like, you know, the last part

1 of 2019. Was it January? You know, I don't know.

2 A. It had to of been towards the end of 2019.

3 Q. Okay.

4 A. Because I told those tenants they had to
5 leave, we were emptying the building for work.

6 Q. Okay. So did -- can you tell me that, you
7 know, by the -- oh, at some point in time, let's say by
8 January 1, how many apartments had people living in
9 them?

10 A. By January 1?

11 Q. January 1 of 2020.

12 A. I would say four.

13 Q. Okay. And say by January 15th.

14 A. Two.

15 Q. Okay. So of the eight apartments, two had
16 people in them and that's the two we're talking about,
17 right, Keith Alston and the woman who we can't -- we
18 don't know her name; right?

19 A. Yes.

20 Q. Okay. Do you have any records that show that,
21 that it would be on or before January 15th?

22 A. No. The records are pretty -- no. I don't.

23 Q. Okay. All right. Do you recall whether any
24 of the windows were boarded up prior to the fire?

25 A. I boarded up all the windows.

1 Q. All of them were?

2 A. Yes.

3 Q. Okay. And do you recall when that was done?

4 A. I believe that I did that the first weekend in
5 February or maybe the last weekend in January.

6 Q. Okay.

7 A. And then all except for the one where the lady
8 was upstairs, I didn't board hers up because she was
9 still getting stuff out.

10 Q. I see.

11 A. She had moved out but she had -- she had so
12 much stuff in there. Anyway, she was getting that
13 stuff out and so I left her windows unboarded.

14 Q. Okay.

15 A. Until she had moved out completely.

16 Q. All right. Did she live in that apartment by
17 herself?

18 A. I believe she had maybe her daughter and a
19 child there. I don't know. I don't remember.

20 Q. Okay. Okay. Well, let me ask about the fire.
21 Do you -- do you recall or do you have any -- scratch
22 that. Let me think.

23 Do you know how the fire started?

24 A. No.

25 Q. Okay. Have you talked to any fire inspectors

1 about the fire?

2 A. The one the insurance adjuster sent. Or not
3 the adjuster. The insurance company, I guess.

4 Q. Was that a company called Rimkus?

5 A. I couldn't tell you.

6 Q. Okay.

7 A. It's been a year.

8 Q. Right. Do you remember his name, by chance?

9 A. No.

10 Q. Okay. Did you talk to anyone with the fire
11 department here in Ponca City, or police about the
12 fire?

13 A. The police -- so the night of the fire, of
14 course, I talked to some firemen. I talked to a
15 detective a day or two after the fire. But because of
16 COVID, I couldn't go to the police department and talk
17 to him about it.

18 Q. Right.

19 A. I don't recall if I ever talked to the fire
20 martial or fire chief about it at any time. I don't
21 recall that.

22 Q. Okay.

23 A. I do remember talking to the fire investigator
24 because that job intrigued me. I think it's an
25 interesting job, so I went to let him in and then

1 talked -- you know, I visited with him while he was
2 there.

3 Q. Do you remember his name, by chance?

4 A. No.

5 Q. Okay. Did he indicate to you what he thought
6 was the cause of the fire?

7 A. I remember he had a general idea where he
8 thought the fire started.

9 Q. Okay.

10 A. And at that point I told him that I had a
11 heater that sat there, so he kind of maybe thought that
12 that was the cause of the fire.

13 Q. Okay. Do you recall that being near a
14 stairwell?

15 A. Yes.

16 Q. Okay. All right. I'm assuming nobody was
17 living there and so they didn't -- so no one got hurt
18 as a result of the fire. Is that correct?

19 A. Not that I'm aware of.

20 Q. Okay. How did you learn about the fire?

21 A. My wife's friend came banging on my front door
22 at 1:00 in the morning or something. I don't remember.

23 Q. Okay. I know there was some -- I think there
24 was some communications from Mr. Jackson to the
25 adjustor on your case about the building maybe possibly

1 needing to be demolished or whatnot. What's the status
2 of the building now as we sit here?

3 A. It's sitting there.

4 Q. It's still there? Okay. The City or anyone
5 hasn't pushed you to -- I used the word push. It's
6 probably not the right word. but asked you to tear it
7 down?

8 A. They did push very hard.

9 Q. Okay.

10 A. And Scott got them to back off.

11 Q. Okay.

12 A. It's, I think, \$20,000 to demo the building.

13 Q. Right. Right. And that's what I needed to
14 know. Have you -- you answered it, but have you got an
15 estimate of some kind of demo'ing the building?

16 A. Yeah. About \$20,000.

17 Q. Okay. And do you know whether or not the
18 insurance company has any figures on that for demo'ing
19 the building?

20 A. Never heard from them.

21 Q. Okay. Well, that's -- yeah. Let me ask just
22 a couple questions about that. I'm mainly interested
23 in the claim itself and the property, but have you had
24 any communications with the insurance company by
25 telephone?

1 A. The insurance company, not that I -- not that
2 I recall.

3 Q. Okay. Well, or someone on their behalf?

4 A. I've talked to an insurance adjuster.

5 Q. Do you remember his name?

6 A. No.

7 Q. Was it a Kevin Wilson, by chance?

8 A. That sounds familiar.

9 Q. Okay. All right. And can you give me an idea
10 of the substance of those conversations? I'm not
11 trying to get specifics down to each one, but what you
12 remember of them.

13 A. Me asking him why I wasn't hearing anything.

14 Q. Okay.

15 A. Him telling me that -- I think he sent me an
16 email maybe, I don't remember, that basically they
17 didn't know if they were going to pay the claim. I
18 asked him if I needed to get my attorney involved.

19 Q. Okay.

20 A. He told me no, that I didn't need to do that.

21 Q. Okay.

22 A. I would just be wasting my money. And I got
23 -- I got kind of heated and I said my attorney is the
24 type of attorney that's going to do it and for way more
25 than what the claim is, and then he's going to get his

1 cut.

2 So I felt like I was being taken advantage of,
3 I guess.

4 Q. Okay. When was the last time that you talked
5 with either Kevin or anyone else from the insurance
6 company other than me here today?

7 A. My guess would have been May.

8 Q. May?

9 A. Would be my guess.

10 Q. Okay. And then other than that,
11 though, Mr. Jackson has had some communications with
12 them. Are you aware of that?

13 A. Yes.

14 Q. Okay. All right.

15 A. I believe.

16 Q. I mean, other than me.

17 A. No. I mean, I know that Scott had emailed
18 them and hadn't had any responses and then finally got
19 a response here just recently.

20 Q. Okay. Were you -- are you aware of any
21 requirements -- not requirements. Let me scratch that.

22 Are you aware of provisions in the insurance
23 policy regarding, you know, smoke detectors and fire
24 extinguishers and that sort of thing?

25 A. It was listed in a letter that I received,

1 yes.

2 Q. Okay. And the letter, would that have been
3 back at the time of the policy issuance or after you
4 made the claim?

5 A. After I made the claim.

6 Q. Might have been called something like a
7 reservation of rights?

8 A. Yes. Yeah.

9 Q. Okay. All right. And so that -- but prior to
10 that, were you aware of that type of language in the
11 policy, you know, at the time that you purchased the
12 policy?

13 A. If you're asking me if I read the policy, no.

14 Q. Okay. All right. Let me ask -- okay. Let me
15 ask the same type of questions about vacancy.

16 Okay. Were you aware of there being issues --
17 not issues but provisions in the policy that relate to
18 coverage in times of remodeling or vacancy and that
19 kind of thing?

20 A. After I received the letter of reservations.

21 Q. Okay. But not before?

22 A. Not before.

23 Q. Okay. Did those subjects at all -- scratch
24 that.

25 Did you -- when you got the policy, did you

1 get that through an agent?

2 A. Yes, sir.

3 Q. Okay. Tell me -- remind me the name of the
4 agent. Swords?

5 A. Originally it was Swords. Yes.

6 Q. Okay. We talked about his name. And then now
7 is it someone -- would it have been someone different
8 prior to the fire?

9 A. Kevin Randall, I believe is his name.

10 Q. Kevin Randall. Okay. Did they at any point
11 explain to you generally -- well, not generally.
12 Scratch that.

13 Did they explain to you the terms of the
14 policy, about you know, what it covered and what it
15 wouldn't cover and that kind of thing?

16 A. No, sir.

17 Q. Okay. And did they -- did you ever have
18 questions you asked of them about coverage that you --
19 that they didn't answer? So I mean, my point there is
20 did you ask something and then they didn't get back to
21 you on it?

22 A. No. I mean, I don't think so.

23 Q. Okay. All right. Let me get back to the
24 fire. You say a neighbor kind of came and got you, you
25 know, and told you about the fire occurring at the

1 time?

2 A. It wasn't a neighbor. It was my wife's
3 friend.

4 Q. Oh, okay. I apologize. So did you go down
5 there then?

6 A. Oh, yes.

7 Q. Okay. Was there already fire and police
8 there?

9 A. It was -- yeah.

10 Q. They were there?

11 A. Yeah.

12 Q. Okay. All right.

13 A. My wife's friend saw on Facebook Live.

14 Q. Okay.

15 A. And so I had -- I turn my phone on silent when
16 I go to bed at night and so they called me like 25
17 times and I didn't answer.

18 Q. Okay.

19 A. And so that's why they came to my house.

20 Q. Have you had a fire there before?

21 A. Yes.

22 Q. Okay. Do you recall when that was?

23 A. Right after I bought the building, I believe.

24 Q. Was it like 12 years ago, 11 years ago,
25 something like that?

1 A. Probably something like that.

2 Q. Again, I need to let you finish first before I
3 start talking again.

4 A. And I'm not even sure if I -- I don't know if
5 it's when I owned the building or it's when me and my
6 business partners owned the building before.

7 Q. Okay.

8 A. Somebody had set some trash on fire in the
9 stairwell. It wasn't much of a fire. It was more of a
10 nuisance.

11 Q. Okay. Did you have a claim for that?

12 A. Oh, yes.

13 Q. Okay. And was it the same insurance company?

14 A. I don't recall.

15 Q. Same policy?

16 A. I would assume so.

17 Q. You think it was the same -- well, scratch
18 that.

19 You think it was the same agent and --

20 A. I don't recall.

21 Q. Don't recall. Okay. So when you first owned
22 the building, it was with other -- you had business
23 partners in it?

24 A. Yes, sir. We had a corporation.

25 Q. Okay. And did you ultimately wind up the sole

1 owner of the building?

2 A. Yes, sir.

3 Q. Do you recall when that year was, what year
4 that would be?

5 A. 2011-ish. Ish.

6 Q. Okay. Okay. So that's like ten years from
7 now. Nine years before the fire that we're here on?

8 A. I think. I don't -- don't hold me to that.

9 Q. Okay. Okay. Did the -- let me -- I may have
10 asked this a moment ago, but when you talked with the
11 fire inspectors, did they -- the one that was with the
12 -- I guess it's the City, right, Ponca City?

13 A. Uh-huh.

14 Q. You have you to say yes or no.

15 A. Oh, when I talked to the fire inspector for
16 Ponca City?

17 Q. He was with Ponca City, right, and you did
18 talk to him?

19 A. When?

20 Q. At some point.

21 A. I don't know.

22 Q. Well, we talked about it a minute ago. Let me
23 get us back to that. When did you -- when did you
24 first talk with the inspector from Ponca City, fire
25 inspector?

1 A. I don't know that I did.

2 Q. Okay. I misunderstood you. I thought you
3 said that you did.

4 A. I don't think so.

5 Q. Okay. You thought he had an interesting job?

6 A. That was the one the insurance guy sent.

7 Q. Oh, okay. Okay. That was confusing.

8 A. No. That was the one the insurance guy sent
9 or the insurance company sent.

10 Q. Okay. So you don't recall ever talking to
11 anyone from the City fire department about this?

12 A. I don't recall that.

13 Q. Okay. Okay. Did the police take a statement
14 from you?

15 A. They did not.

16 Q. Okay. And obviously you would remember if it
17 was someone with the fire department? They didn't take
18 a statement from you?

19 A. Not that I recall.

20 Q. Okay. All right. Do you know whether
21 Mr. Crawford was there the night of the fire?

22 A. Not that I'm aware of.

23 Q. Okay. Do you know whether he was interviewed
24 by the police or the fire department in their
25 investigation?

1 A. Not that I'm aware of.

2 MR. LINSKOTT: Okay. Okay. All right.
3 Okay. Let's take a short break because I want to move
4 on to another area and then we won't have that much
5 more.

6 MR. JACKSON: Sounds good.

7 (A brief recess was here had.)

8 BY MR. LINSKOTT:

9 Q. Okay. Mr. Fields, let me ask a couple
10 questions back on this Exhibit 1. If you'll look on
11 page -- I think it's Page 2, the second page of it, I
12 think I asked you earlier about providing any
13 information in a phone call. And I think you weren't
14 sure, you didn't remember it specifically?

15 A. Phone call with who?

16 Q. The gentleman that did this inspection.

17 A. Oh, this guy?

18 Q. Excuse me. Yeah. Jack McNeal. If you'll
19 look at the third page, rather, there it has a heading
20 that says Protection. Do you see that?

21 A. Yes.

22 Q. Okay. And remember, this would have been
23 somewhere around, you know, May through July is the
24 time frame of 2015. And it asks -- it says currently
25 tagged fire extinguishers, yes.

1 Do you recall telling Mr. McNeal that there
2 were currently tagged fire extinguishers in the
3 facility?

4 A. I don't know if I said tagged, but if he would
5 have asked, I would have told him there was fire
6 extinguishers, yes.

7 Q. Okay. And it says building contains fire
8 detection system, and it says no.

9 Do you recall that being the case or telling
10 Mr. McNeal that?

11 A. I don't -- I don't recall that, but I probably
12 would have told him that there was not a fire detection
13 system, yes.

14 Q. Okay. Do you include smoke detection in fire
15 detection in your mind?

16 A. Not as a system, no.

17 Q. Okay. So that wouldn't be inquiring to you
18 whether there were smoke detectors?

19 A. No. But I stated right down there that there
20 was smoke detectors.

21 Q. Right. That's what I'm trying to see, because
22 here it says no.

23 A. I'm in the construction industry, so to me a
24 smoke detection system is when a fire detection company
25 comes in, puts them everywhere, runs wires and

1 everything is integrated and it calls the fire
2 department. That's a fire detection system to me.

3 Q. Okay. Okay. All right. I can see that.
4 That may be actually the case. So down in the comment
5 area, again, just review that. And is this -- do you
6 recall providing that information to the inspector or
7 that it's consistent with what your understanding was
8 at the time? Under the comments it says there are fire
9 extinguishers and smoke detectors in all units
10 according to the owner. Is that true at the time?

11 A. I don't recall saying that, but that's pretty
12 accurate. It sounds like exactly what I would say.

13 Q. All right. It says the fire extinguishers and
14 smoke detectors are maintained and inspected by the
15 maintenance man at the time of new tenants moving in
16 and out, which is consistent with what you said a
17 moment ago. Is that correct?

18 A. That's correct.

19 Q. Okay. And the smoke detectors are all battery
20 operated. All right. The information on the special
21 hazards, does that look like information that you would
22 have provided to him or that was consistent with what
23 you believe was the case at the time?

24 And I'll read it. It says: There are personal
25 grills for cooking on the premises. The policy is that

1 grills must be at least ten feet from the building when
2 being used.

3 A. Are you asking if I told him that?

4 Q. Right.

5 A. I mean, that's what we told everybody, yes.

6 Q. Okay. And that was the case at the time;
7 true?

8 A. I'm sorry. I don't understand.

9 Q. This was true at the time here in 2015?

10 A. That we told people to keep their grills away
11 from the building?

12 Q. Well, yes, or that you provided that
13 information to the inspector.

14 A. Oh. I assume that I did. I mean, that's what
15 he said I said.

16 Q. Okay. All right. Okay. Let me ask you a few
17 names here. Let me find a name here. Do you recall
18 visiting with a Detective Brian Dye?

19 A. Yes.

20 Q. Okay. Do you know Mr. Dye?

21 A. Yes.

22 Q. Okay. I mean, you knew him prior to the fire
23 and after, I assume.

24 A. Oh, yes. Small town.

25 Q. Exactly. Okay. How many people are in Ponca

1 City?

2 A. 25,000=ish.

3 Q. 25,000?

4 A. Yeah.

5 Q. Okay. I lived for a time in Vinita, which is
6 about 5,000. And yes. Everyone knew everybody.

7 A. We're not quite that small. But no.
8 I visited with Brian Dye on more than one occasion
9 about things.

10 Q. Okay. Mr. Dye indicated that he did not
11 observe -- if he indicated that he did not observe any
12 smoke alarms throughout the building or fire
13 extinguishers, would he be wrong, after the fire?
14 Right after the fire?

15 A. I would say he is probably correct.

16 Q. Okay. Because they were all pulled out?

17 A. Yes, sir.

18 Q. Because of the remodel?

19 A. Yes, sir.

20 Q. Okay. Do you recall a padlock being on a rear
21 door of the apartment complex?

22 A. That's how we secured it, yes.

23 Q. Okay. Do you remember whether -- did you ever
24 learn that that padlock had been cut prior to the fire?

25 A. I learned or I was told by somebody that -- or

1 maybe I saw it, but I don't know that it was cut.

2 Q. My bad. I assumed. It says broken. Was
3 broken prior to?

4 A. I believe, and I don't know that this is
5 correct, but I believe the hasp had been pried off of
6 the wall. I believe that I had seen that, but I didn't
7 know. I mean, I don't know that -- who did it.

8 Q. Okay.

9 A. Maybe the fire department, but maybe not
10 because somebody had to -- I mean, somebody got in the
11 building, obviously.

12 Q. Okay. Okay. And was -- and help me with
13 this. Mr.-- -- I think it's Crawford. Is that the
14 maintenance man?

15 A. Yes.

16 Q. Was he -- he was still working for you for
17 that apartment complex at the time --

18 A. Yes.

19 Q. -- of the fire?

20 A. Yes.

21 Q. Okay. Okay. Did you happen to ask him or
22 know from some experience when was the last time he was
23 there at the apartment complex before the fire?

24 A. I don't recall. I would -- I would assume
25 that he had been there earlier that day working, but

1 it's been long enough that I don't know and he could
2 have been at another job working that day.

3 Q. Because he was doing the remodeling; right?

4 A. On that building, but he did some other stuff
5 too.

6 Q. Okay. And then how long after the fire did he
7 move away?

8 A. Oh, months. He continued to work for my
9 stepfather on his ranch.

10 Q. Okay. Okay. So he did all kinds of jobs
11 then?

12 A. Yeah. This guy has worked for me forever. I
13 mean, for over a decade.

14 Q. Okay. All right. And do I remember this
15 right that you may have contact information for him or
16 not?

17 A. I have a phone number. I don't know that -- I
18 don't know that it's good.

19 Q. We talked about that earlier with your
20 counsel.

21 A. I haven't tried to call him.

22 Q. Forgive me. I went back over that ground one
23 time before.

24 Let me look at this and we may be close.

25 I asked you, I think, Mr. Fields, about a

1 prior fire and a prior claim. Did you have any other
2 claims on that property, property claims?

3 A. Not that I recall. Not that I recall.

4 Q. You said that you've had -- we talked a little
5 bit about some communications with Kevin Wilson, we
6 think, but with the adjuster?

7 A. Yes.

8 Q. The adjuster from Great Lakes Insurance
9 Company?

10 A. Yeah.

11 Q. Did -- did you provide him with any lists of
12 any items that are particularly needed to be replaced
13 other than the building itself, like contents of some
14 kind or any claims related to that?

15 A. I don't believe I did, but I don't believe I
16 had contents insurance. It's a rental property.

17 Q. Okay. So was there any other -- other than
18 the property loss itself, the building, was there any
19 other claim that you were making as a result of the
20 fire?

21 A. I don't think so.

22 Q. That you made? Okay.

23 A. I don't think so.

24 Q. Did you make the claim through your agent?

25 A. Yes.

1 Q. Okay. And then he made the claim through to
2 Great Lakes, and then from there it went on. Right?

3 A. I don't know how that took place. I just told
4 my insurance agent we had a problem.

5 Q. Okay. Are you aware of any other -- scratch
6 that.

7 We talked a moment ago about the City wanting
8 to tear down the building; right?

9 A. Yes, sir.

10 Q. Okay. And that your attorney has stopped that
11 for the moment?

12 A. Yes, sir.

13 Q. Is there anything else like that that is
14 causing an issue with you with either the City or
15 someone else from the standpoint of causing you harm or
16 damage in some way?

17 A. I'm not sure that I understand the question.

18 Q. I mean covered by the policy. Okay? If you
19 know.

20 So let me ask that a little better than that.
21 In your mind, the building is covered under the policy;
22 right?

23 A. Yes, sir.

24 Q. Because of the fire?

25 A. Yes, sir.

1 Q. Is there some other type of claim that you
2 think is covered under the policy as you sit here? I'm
3 not locking you into it one way or the other.

4 I'm just asking you if you --

5 A. I don't think so. Not that I'm aware of.

6 Q. Okay. Okay. I'll give you an example. There
7 are some policies -- and I'm not saying one way or the
8 other on this one. But there are some policies that
9 you have a loss of income.

10 A. Loss of rent. I got you.

11 Q. And that kind of thing.

12 A. I don't believe that I have that. I don't
13 believe that I have that coverage. I don't know why I
14 would have. I'm not -- it wasn't a concern of mine, so
15 I don't think I do.

16 Q. Okay. But it's not -- there isn't something
17 else you've raised to the insurance company? And
18 again, I'm not saying you have to. But I'm just asking
19 if there was something else that you've raised with
20 them.

21 A. No. I don't think so.

22 Q. Okay. Has -- we've talked about you talking
23 with the one fire inspector that came out with the --

24 A. Yes, sir.

25 Q. Okay. Have you provided any -- has anyone

1 else come and asked you questions about what happened
2 with the fire other than what we've covered here today?
3 For example, news people or some other company for some
4 reason?

5 A. I don't believe so.

6 MR. LINSKOTT: Okay. Well, I think I'm
7 done. I think I'm done.

8 MR. JACKSON: Okay. No questions here.

9 MR. LINSKOTT: Thank you for your time.

10 (Proceedings ended at 11:11 a.m.)

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

C E R T I F I C A T E

STATE OF OKLAHOMA)
) ss.
COUNTY OF KAY)

I, Sonya Kay Meneely, Certified Shorthand Reporter within and for the State of Oklahoma, do certify that the foregoing proceedings were taken at the time and place herein named; that the transcript is a true record of the proceedings as reported by me and thereafter transcribed into typewriting by computer.

I do further certify that I am not counsel, attorney, or relative of either party, or clerk or stenographer of either party or of the attorney of either party, or otherwise interested in the event of this suit.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal at my office in Ponca City, Kay County, Oklahoma, this 1st day of April, 2021.

SONYA KAY MENEELY, CSR
Scribe Reporting Service
PO Box 2534
Ponca City, Oklahoma 74602



Limited Multi-Peril Survey

If you have any questions
about this report please
contact Customer Care at
1-800-460-0723 ext. 707.

Ref #: 13009450 Policy #: CP00058570
Name: Joshua Fields
Location: 410 W Cleveland
City: PONCA CITY
State: OK Zip: 74601 Coverage: \$325,450.00

Client Name: M. J. Kelly of ARKANSAS - 202
Agt Name: Zac Swords
Requested By: jbetts@mjkellyar.com
Effective Inception/Renewal Date: 01/01/1900
Inspected By: McNeal, Jack

Code:
Date: 05/11/2015
Date: 05/20/2015

Recommendation(s)

2015-5-01

CH-2 During our survey there were deficiencies noted with the property. These included the following:
Cracks in the exterior wall of the garage/storage buildings. Trees touching the storage buildings need to be trimmed. A window on the main building has been boarded over. A licensed contractor should be retained to evaluate and repair these deficiencies. There are cracks in the concrete blocks and mortar in both of the garage or storage buildings. The cracks are in the west side garage/storage building on the north and south ends.

2015-5-02

A maintenance program should be implemented for the smoke detectors, with batteries being tested on a monthly basis and the batteries being completely replaced every six months. Written documentation should be retained regarding testing and replacement.

2015-6-03

All exterior stairs having three or more steps should be provided with handrails on both sides to reduce the potential for falls. Handrails should be 34" to 38" in height with vertical members having no greater width than 4".

FOR COMPLETION BY THE INSURED:

By signing this form, I Josh Fields (print name), certify that all
required recommendations found during the recently conducted inspection have
been fully complied with as of 7/23/15 (date).

X [Signature]
(Insured - Signature)

7/22/15
Date Signed



This report is made from limited observation and information that may have been obtained in whole or in part, from third parties. Reliable Reports, Inc. ("Reliable") disclaims any responsibility for, and assumes no liability as a result of, inaccuracies or misinformation received by Reliable from third party sources. Any replacement cost valuations contained in this report are prepared using software and replacement cost information provided by third parties. No warranty, express or implied, is made as to the accuracy or completeness of any replacement cost valuation. This report is not performed as an undertaking on behalf of, or for the benefit of, the named insured or others. By accepting this report, the requesting company, its reinsures and its clients agree to hold Reliable free and harmless from any claims or liability whatsoever.



Limited Multi-Peril Survey

If you have any questions
about this report please
contact Customer Care at
1-800-460-0723 ext. 707.

Ref #: 13009450 Policy #: CP00058570
Name: Joshua Fields
Location: 410 W Cleveland
City: PONCA CITY
State: OK Zip: 74601 Coverage: \$325,450.00

Client Name: M. J. Kelly of ARKANSAS - 202
Agt Name: Zac Swords
Requested By: jbetts@mjkellyar.com
Effective Inception/Renewal Date: 01/01/1900
Inspected By: McNeal, Jack

Code:
Date: 05/11/2015
Date: 05/20/2015

Operations

Who was Interviewed: Mr. Joshua Fields- owner
Type of Occupancy: Lodging
Years in Business: 10 yrs.
Hours of Operation: 24/7
Gross Receipts: \$27,300
Insured is Building Owner or Tenant: Owner

Comment

The property is owned and managed by Mr. Joshua Fields. He has owned the property for approximately 10 years. The property consists of 8 apartments. One of the apartments is the residence for his full time maintenance man. The maintenance man pays no rent as part of his wages for maintaining the property. The annual gross receipts are approximately \$27,300 dollars.

Premises

Construction: Frame
Roof Type: Shingles, Fiberglass
Building Age: 55 yrs old
Number of Stories: 2
Type of Heating: Central
Type of Fuel: Gas
Is It Vented: Yes
Type of Wiring: (by interview) Copper
Wiring Updates: Yes ***
Any Unsafe Wiring Noted: No
Condition of Building: Fair ***
Housekeeping: Good
Square Footage: 7,200 sq. ft.

Comment

The main building is two story of frame construction, with a brick veneer exterior. The building is approximately 55 years old. It is 7200 sf. There is central gas heating in the units, with window air conditioning. The wiring is all copper, and was completely updated in 2011. The building is noted to be in fair condition due to a boarded window on the rear of this building.

There are two joisted masonry structure used as garage/storage units in the rear of the property. They are 1257 sf and 1210 sf. They are noted to be in fair condition due to cracks in the exterior walls. Also there are trees touching the buildings.

This report is made from limited observation and information that may have been obtained in whole or in part, from third parties. Reliable Reports, Inc. ("Reliable") disclaims any responsibility for, and assumes no liability as a result of, inaccuracies or misinformation received by Reliable from third party sources. Any replacement cost valuations contained in this report are prepared using software and replacement cost information provided by third parties. No warranty, express or implied, is made as to the accuracy or completeness of any replacement cost valuation. This report is not performed as an undertaking on behalf of, or for the benefit of, the named insured or others. By accepting this report, the requesting company, its reinsurers and its clients agree to hold Reliable free and harmless from any claims or liability whatsoever.



Limited Multi-Peril Survey

If you have any questions
about this report please
contact Customer Care at
1-800-460-0723 ext. 707.

Ref #:	13009450	Policy #:	CP00058570	Client Name:	M. J. Kelly of ARKANSAS - 202	Code:	
Name:	Joshua Fields			Agt Name:	Zac Swords	Date:	05/11/2015
Location:	410 W Cleveland			Requested By:	jbetts@mjkellyar.com	Date:	05/20/2015
City:	PONCA CITY			Effective Inception/Renewal Date:	01/01/1900		
State:	OK	Zip:	74601	Coverage:	\$325,450.00	Inspected By:	McNeal, Jack

Protection

Is Building In City Limits:	Yes
Distance to Fire Hydrant:	0-500
Distance to Fire Department:	0-3 miles
Currently Tagged Fire Extinguisher(s):	Yes
Building Contains Fire Detection System:	No
Building Contains Sprinkler System:	No
Burglar Alarm System:	No
If Yes, Is it monitored by central station:	No

Comment

There are fire extinguishers, and smoke detectors in all units, according to the owner. The fire extinguishers and smoke detectors are maintained and inspected by the maintenance man at the time of new tenants moving in, or out. The smoke detectors are all battery operated.

Special Hazards

Any Special Hazards: (If Yes Explain) Yes ***

Comment

There are personal grills for cooking on the premises. The policy is that grills must be at least 10 feet from the building when being used.

Liability

Exit Doors Swing Outward:	No ***
Lighted Exit Signs:	No
Emergency Lights:	No
Floors Free of Disruptions:	Yes
Any Stairs Present:	Yes ***
If Yes, Interior/Exterior:	Interior
If Yes, Condition:	Good
Exterior Trip or Fall Hazards:	No
Condition of Parking Lot:	Good
Exterior Lighting:	Good

Comment

The exit doors pen inward. There are interior stairs leading to the second floor. The stairs appear to be in good condition and equipped with a handrail, however there are no vertical members. There is an emergency exit on the second floor that leads to a fire escape.

This report is made from limited observation and information that may have been obtained in whole or in part, from third parties. Reliable Reports, Inc. ("Reliable") disclaims any responsibility for, and assumes no liability as a result of, inaccuracies or misinformation received by Reliable from third party sources. Any replacement cost valuations contained in this report are prepared using software and replacement cost information provided by third parties. No warranty, express or implied, is made as to the accuracy or completeness of any replacement cost valuation. This report is not performed as an undertaking on behalf of, or for the benefit of, the named insured or others. By accepting this report, the requesting company, its reinsures and its clients agree to hold Reliable free and harmless from any claims or liability whatsoever.



Limited Multi-Peril Survey

If you have any questions
about this report please
contact Customer Care at
1-800-460-0723 ext. 707.

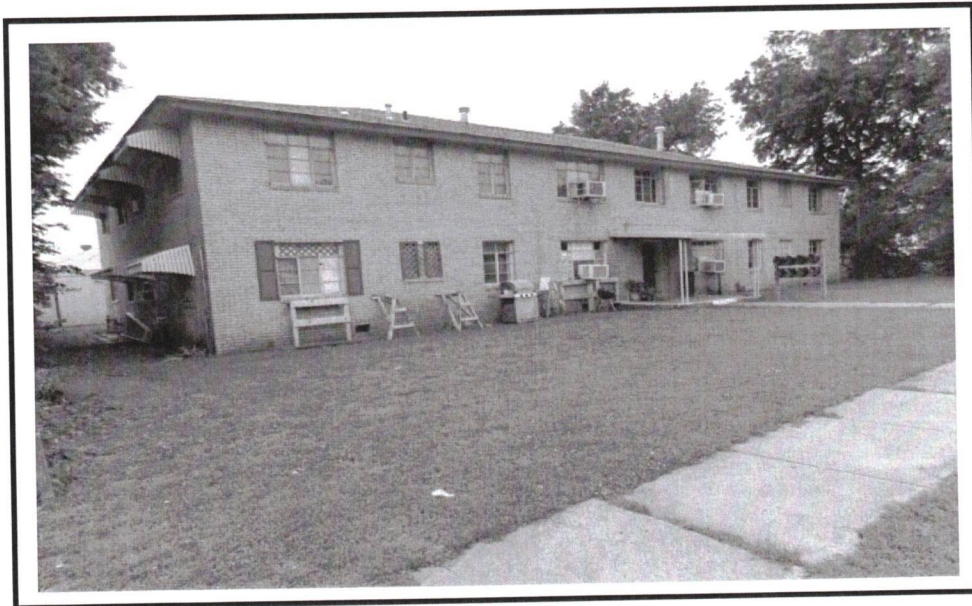
Ref #: 13009450 Policy #: CP00058570
Name: Joshua Fields
Location: 410 W Cleveland
City: PONCA CITY
State: OK Zip: 74601 Coverage: \$325,450.00

Client Name: M. J. Kelly of ARKANSAS - 202
Agt Name: Zac Swords
Requested By: jbetts@mjkellyar.com
Effective Inception/Renewal Date: 01/01/1900
Inspected By: McNeal, Jack

Code:
Date: 05/11/2015
Date: 05/20/2015

Note(s)

Front



Note(s)

Front



This report is made from limited observation and information that may have been obtained in whole or in part, from third parties. Reliable Reports, Inc. ("Reliable") disclaims any responsibility for, and assumes no liability as a result of, inaccuracies or misinformation received by Reliable from third party sources. Any replacement cost valuations contained in this report are prepared using software and replacement cost information provided by third parties. No warranty, express or implied, is made as to the accuracy or completeness of any replacement cost valuation. This report is not performed as an undertaking on behalf of, or for the benefit of, the named insured or others. By accepting this report, the requesting company, its reinsurers and its clients agree to hold Reliable free and harmless from any claims or liability whatsoever.



Limited Multi-Peril Survey

If you have any questions
about this report please
contact Customer Care at
1-800-460-0723 ext. 707.

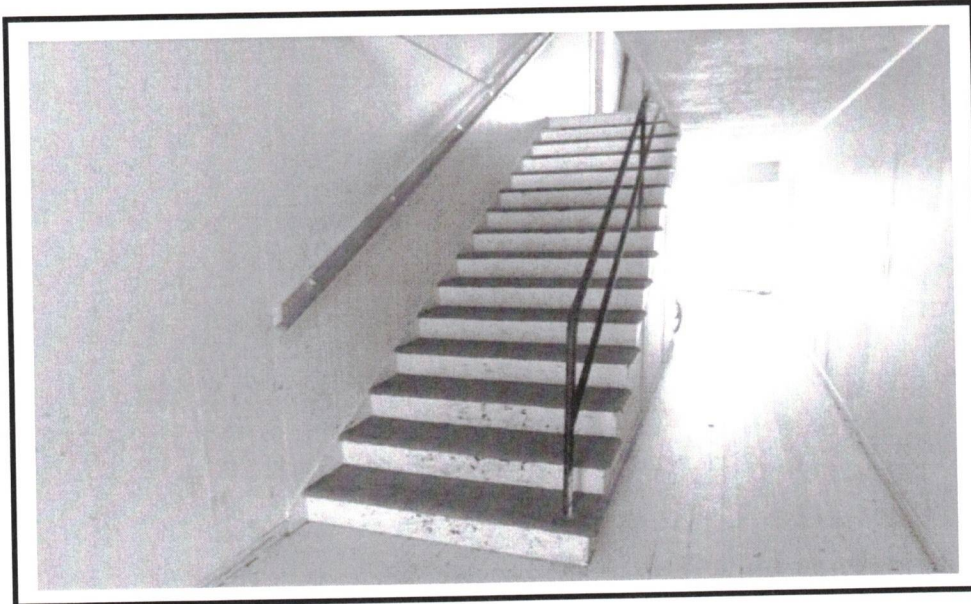
Ref #: 13009450 Policy #: CP00058570
Name: Joshua Fields
Location: 410 W Cleveland
City: PONCA CITY
State: OK Zip: 74601 Coverage: \$325,450.00

Client Name: M. J. Kelly of ARKANSAS - 202
Agt Name: Zac Swords
Requested By: jbetts@mjkellyar.com
Effective Inception/Renewal Date: 01/01/1900
Inspected By: McNeal, Jack

Code:
Date: 05/11/2015
Date: 05/20/2015

Note(s)

Inside stairway



Note(s)

Rear



This report is made from limited observation and information that may have been obtained in whole or in part, from third parties. Reliable Reports, Inc. ("Reliable") disclaims any responsibility for, and assumes no liability as a result of, inaccuracies or misinformation received by Reliable from third party sources. Any replacement cost valuations contained in this report are prepared using software and replacement cost information provided by third parties. No warranty, express or implied, is made as to the accuracy or completeness of any replacement cost valuation. This report is not performed as an undertaking on behalf of, or for the benefit of, the named insured or others. By accepting this report, the requesting company, its reinsures and its clients agree to hold Reliable free and harmless from any claims or liability whatsoever.



Limited Multi-Peril Survey

If you have any questions
about this report please
contact Customer Care at
1-800-460-0723 ext. 707.

Ref #: 13009450 Policy #: CP00058570
Name: Joshua Fields
Location: 410 W Cleveland
City: PONCA CITY
State: OK Zip: 74601 Coverage: \$325,450.00

Client Name: M. J. Kelly of ARKANSAS - 202
Agt Name: Zac Swords
Requested By: jbetts@mjkellyar.com
Effective Inception/Renewal Date: 01/01/1900
Inspected By: McNeal, Jack

Code:
Date: 05/11/2015
Date: 05/20/2015

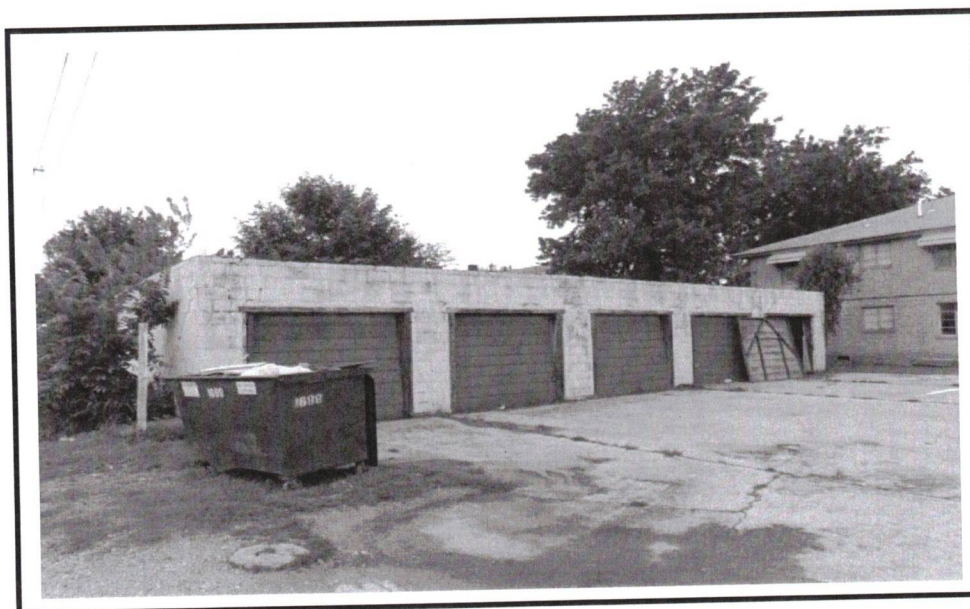
Note(s)

Building 2



Note(s)

Building 3



This report is made from limited observation and information that may have been obtained in whole or in part, from third parties. Reliable Reports, Inc. ("Reliable") disclaims any responsibility for, and assumes no liability as a result of, inaccuracies or misinformation received by Reliable from third party sources. Any replacement cost valuations contained in this report are prepared using software and replacement cost information provided by third parties. No warranty, express or implied, is made as to the accuracy or completeness of any replacement cost valuation. This report is not performed as an undertaking on behalf of, or for the benefit of, the named insured or others. By accepting this report, the requesting company, its reinsurers and its clients agree to hold Reliable free and harmless from any claims or liability whatsoever.



Limited Multi-Peril Survey

If you have any questions
about this report please
contact Customer Care at
1-800-460-0723 ext. 707.

Ref #: 13009450 Policy #: CP00058570
Name: Joshua Fields
Location: 410 W Cleveland
City: PONCA CITY
State: OK Zip: 74601 Coverage: \$325,450.00

Client Name: M. J. Kelly of ARKANSAS - 202
Agt Name: Zac Swords
Requested By: jbetts@mjkellyar.com
Effective Inception/Renewal Date: 01/01/1900
Inspected By: McNeal, Jack

Code:
Date: 05/11/2015
Date: 05/20/2015

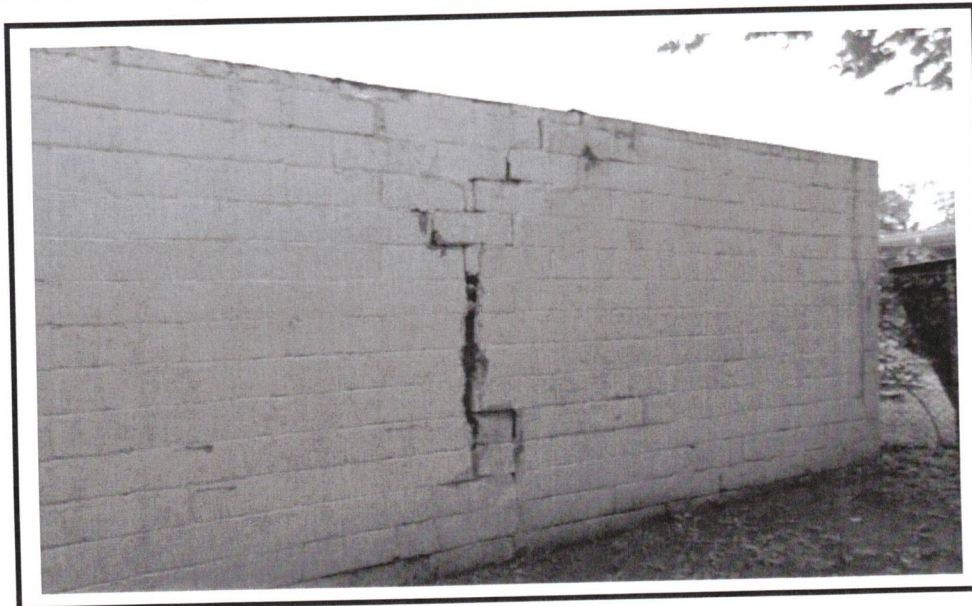
Note(s)

Overgrown bushes rear west side garage



Note(s)

Cracked concrete blocks west side garage



This report is made from limited observation and information that may have been obtained in whole or in part, from third parties. Reliable Reports, Inc. ("Reliable") disclaims any responsibility for, and assumes no liability as a result of, inaccuracies or misinformation received by Reliable from third party sources. Any replacement cost valuations contained in this report are prepared using software and replacement cost information provided by third parties. No warranty, express or implied, is made as to the accuracy or completeness of any replacement cost valuation. This report is not performed as an undertaking on behalf of, or for the benefit of, the named insured or others. By accepting this report, the requesting company, its reinsurers and its clients agree to hold Reliable free and harmless from any claims or liability whatsoever.



Limited Multi-Peril Survey

If you have any questions
about this report please
contact Customer Care at
1-800-460-0723 ext. 707.

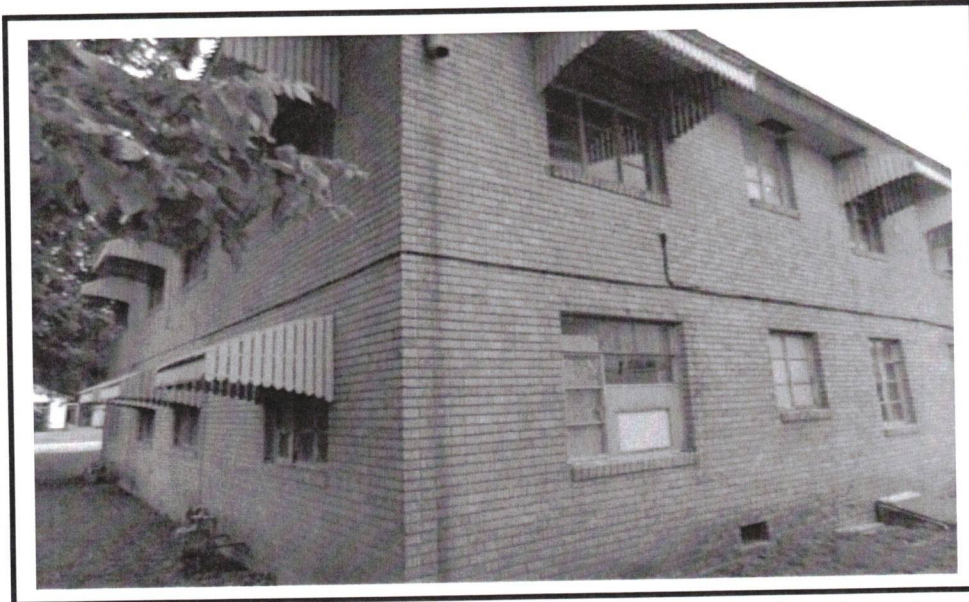
Ref #: 13009450 Policy #: CP00058570
Name: Joshua Fields
Location: 410 W Cleveland
City: PONCA CITY
State: OK Zip: 74601 Coverage: \$325,450.00

Client Name: M. J. Kelly of ARKANSAS - 202
Agt Name: Zac Swords
Requested By: jbetts@mjkellyar.com
Effective Inception/Renewal Date: 01/01/1900
Inspected By: McNeal, Jack

Code:
Date: 05/11/2015
Date: 05/20/2015

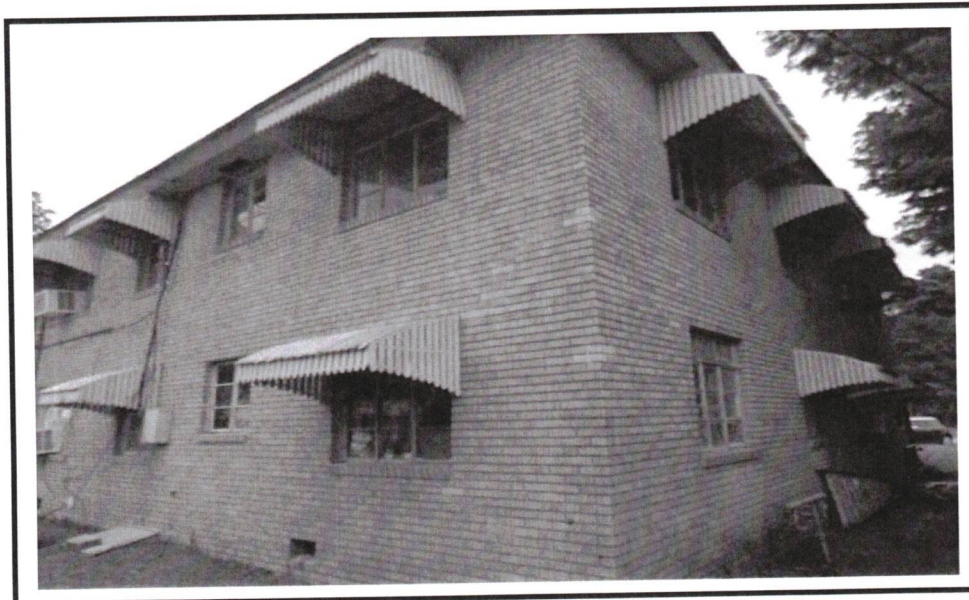
Note(s)

Rear



Note(s)

Rear



This report is made from limited observation and information that may have been obtained in whole or in part, from third parties. Reliable Reports, Inc. ("Reliable") disclaims any responsibility for, and assumes no liability as a result of, inaccuracies or misinformation received by Reliable from third party sources. Any replacement cost valuations contained in this report are prepared using software and replacement cost information provided by third parties. No warranty, express or implied, is made as to the accuracy or completeness of any replacement cost valuation. This report is not performed as an undertaking on behalf of, or for the benefit of, the named insured or others. By accepting this report, the requesting company, its reinsures and its clients agree to hold Reliable free and harmless from any claims or liability whatsoever.



Limited Multi-Peril Survey

If you have any questions
about this report please
contact Customer Care at
1-800-460-0723 ext. 707.

Ref #: 13009450 Policy #: CP00058570
Name: Joshua Fields
Location: 410 W Cleveland
City: PONCA CITY
State: OK Zip: 74601 Coverage: \$325,450.00

Client Name: M. J. Kelly of ARKANSAS - 202
Agt Name: Zac Swords
Requested By: jbetts@mjkellyar.com
Effective Inception/Renewal Date: 01/01/1900
Inspected By: McNeal, Jack

Code:
Date: 05/11/2015
Date: 05/20/2015

Note(s)

Peeling paint all fascia



This report is made from limited observation and information that may have been obtained in whole or in part, from third parties. Reliable Reports, Inc. ("Reliable") disclaims any responsibility for, and assumes no liability as a result of, inaccuracies or misinformation received by Reliable from third party sources. Any replacement cost valuations contained in this report are prepared using software and replacement cost information provided by third parties. No warranty, express or implied, is made as to the accuracy or completeness of any replacement cost valuation. This report is not performed as an undertaking on behalf of, or for the benefit of, the named insured or others. By accepting this report, the requesting company, its reinsures and its clients agree to hold Reliable free and harmless from any claims or liability whatsoever.